



January 2, 2020

**BY ECF**

The Honorable LaShann DeArcy Hall  
 United States District Judge  
 United States District Court for the Eastern District of New York  
 225 Cadman Plaza East  
 Brooklyn, New York 11201

RE: *Ira Kleiman et al. v. Craig Wright*, No. 1:19-mc-02303-LDH (E.D.N.Y.)

Dear Judge DeArcy Hall:

We act as counsel for Plaintiffs in the above captioned matter and are writing to apprise the court of the quickly approaching discovery deadline set in the underlying matter.

Specifically, per the attached scheduling order, all discovery must be completed by January 17, 2020. ECF No. 320, *Kleiman v. Wright*, No. 9:18-cv-80176-BB (S.D. Fla. Nov. 27, 2019). The court has made clear this deadline will not be extended. *Id.* (“**The Court takes this time to also caution the parties that no further extensions of time shall be granted as to the pretrial deadlines in effect.**”) (emphasis in original).

Furthermore, per the local rules in the SDFL, out of state depositions, like Mr. Sullivan’s, require at least 14 days’ notice to opposing counsel (though the parties or the court may allow the deposition to proceed on shorter notice). SDFL L.R. 26.1(h). Without party or court consent, however, Plaintiffs would have to notice Mr. Sullivan’s deposition by tomorrow, to be taken on January 17, 2020 (*i.e.*, the discovery cutoff). For that reason, the parties intend to notice Mr. Sullivan’s deposition for January 17, 2020 (with the understanding that it will not stand if this Court grants the motion to quash).

Finally, below is a chart of the remaining depositions scheduled to be taken before the discovery cutoff on January 17, 2019:

Deponent	Date	Location of Depo
F. Harley Norwitch (Def’s Expert)	1/3/20	Loxahatchee, FL
Andreas Antonopoulos (Plts’ Expert)	1/7/20	New York
William R. Nicholson (Def’s Expert)	1/9/20	Jacksonville, FL
W&K Info Defense Research LLC	1/9/20	Coral Gables, FL
Dr. Stewart MacIntyre, Jr. M.D. (Def’s Expert)	1/10/20	Miami, FL
Ira Kleiman	1/10/20	Coral Gables, FL
Matthew Edman (Plts’ Expert)	1/14/20	New York
Dr. Craig Wright (day 1)	1/14/20	London
Andrew O’Hagan (tentatively)	1/15/20	London
Dr. Craig Wright (day 2)	1/15/20	London
Ramona Watts (tentatively)	1/16/20	London
David J. White (Def’s Expert)	1/16/20	Los Angeles



In sum, Plaintiffs have a very narrow window in which to enforce the subpoena and take Mr. Sullivan's deposition in the event the Court denies his motion to quash.

Finally, Plaintiffs are well aware that they requested multiple extension on this case, and recognize this delay is, therefore, partly their fault. That said, Plaintiffs requested those extensions as they believed, in good faith, that the case would settle. The Defendant, however, on October 30, 2019, unilaterally (and without notice) broke the non-binding agreement in principal that parties had entered into. Plaintiffs therefore respectfully request the court excuse this unfortunate delay.

Respectfully,

/s/ Joseph Delich

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